

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA

IN RE:	:	BK. No. 17-16714
Lance David Lewis	:	
Debtor	:	Chapter No. 13
	:	
Consumer Portfolio Service	:	
Movant	:	

DEBTOR’S ANSWER TO CONSUMER PORTFOLIO SERVICE’S
MOTION FOR RELIEF

Debtor, Lance David Lewis, by and through his attorneys, Jeanne Marie Cella and Associates, LLC, answer Consumer Portfolio Service (“Movant’s”) Motion for Relief from the Automatic Stay and respectfully represents the following:

1. Defendant is without knowledge as to the truth of the assertion. Strict proof required at trial.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Admitted.
7. Admitted.
8. Denied. Strict proof required at trial.
9. Denied. Strict proof required at trial.
10. Denied. Strict proof required at trial.
11. Denied. Strict proof required at trial.
12. Denied. Strict proof required at trial.

13. Admitted.
14. Admitted.
15. Admitted.
16. Averment does not require a response.
17. Averment sets forth a conclusion of law.
18. Averment sets forth a conclusion of law.
19. Averment sets forth a conclusion of law.
20. Averment sets forth a conclusion of law.
21. Averment sets forth a conclusion of law.
22. Averment sets forth a conclusion of law.
23. Averment does not require a response.
24. Denied as stated. Strict proof required.
25. Averment sets forth a conclusion of law.
26. Denied as stated. Strict proof required.
27. Denied as stated. Strict proof required.
28. Debtor plans to cure the arrearage with finance company.
29. Averment does not require a response.
30. Averment does not require a response.
31. Averment does not require a response.

WHEREFORE, the debtor respectfully requests that this Honorable Court deny Movant's Motion for Relief from the Automatic Stay.

Respectfully Submitted,
Jeanne Marie Cella and Associates, LLC

BY: /s/ Jeanne Marie Cella, Esq
Jeanne Marie Cella, Esq.
Attorney for Debtor
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Dated: March 22, 2018

EXHIBIT “A”